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Docket No.: 52-025

ND-20-0748 10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission **Document Control Desk** Washington, DC 20555-0001

> Southern Nuclear Operating Company Vogtle Electric Generating Plant Unit 3 ITAAC Closure Notification on Completion of ITAAC 2.1.02.09c [Index Number 44]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.1.02.09c [Index Number 44] for verification that controls exist to trip the pressurizer heaters after a signal is generated by the PMS. The closure process for this ITAAC is based on the guidance described in NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Regulatory Affairs Director Vogtle 3 & 4

Enclosure:

Vogtle Electric Generating Plant (VEGP) Unit 3

Completion of ITAAC 2.1.02.09c [Index Number 44]

MJY/GRS/sfr

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Vogtle Electric Generating Plant (VEGP) Unit 3 Completion of ITAAC 2.1.02.09c [Index Number 44]

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ITAAC Statement

Design Commitment:

9.c) The pressurizer heaters trip after a signal is generated by the PMS.

Inspection, Tests, Analyses:

Testing will be performed to confirm trip of the pressurizer heaters identified in Table 2.1.2-3.

Acceptance Criteria:

The pressurizer heaters identified in Table 2.1.2-3 trip after a signal is generated by the PMS.

ITAAC Determination Basis

Testing was performed to demonstrate the pressurizer heaters trip after a signal is generated by the Protection and Safety Monitoring System (PMS). This testing confirms that the pressurizer heaters identified in Combined Operating License (COL) Appendix C Table 2.1.2-3 (Attachment A) trip after a signal is generated by the PMS.

Testing was performed in accordance with Unit 3 Initial Test Program (ITP) work package 1109892 (Reference 1). This work package utilized component test procedure B-GEN-ITPCI-039 (Reference 2) to confirm that the pressurizer heaters identified in Attachment A trip after a signal is generated by the PMS.

References 1 and 2 established initial conditions with each pressurizer heater breaker closed. An actuation signal was generated by PMS using the PMS Maintenance and Test Panel (MTP) to trip the pressurizer heater breakers. Each breaker was verified locally to be open (trip position) after the receipt of the trip signal.

The completed Unit 3 component test results (reference 1), reviewed in Reference 3 confirm that each of the pressurizer heaters identified in Table 2.1.2-3 trip after a signal is generated by the PMS.

Reference 3 is available for NRC inspection as part of the ITAAC 2.1.02.09c Completion Package (Reference 4).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.1.02.09c (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.1.02.09c was performed for VEGP Unit 3 and that the prescribed acceptance criteria were met.

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Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

- 1. WO 1109892, "PMS CIM Component Test for ECS Components ITAAC: SV3-2.1.02.09c and 2.1.02.13b"
- 2. B-GEN-ITPCI-039, "Version 7, PMS CIM Component Test Procedure"
- 3. SV3-PMS-ITR-800044, Rev. 0, "Unit 3 Testing Results of Pressurizer Heater Trip: ITAAC 2.1.02.09c NRC Index Number: 44"
- 4. 2.1.02.09c-U3-CP-Rev0, ITAAC Completion Package

Attachment A

*Excerpt from Combined License Appendix C Table 2.1.2-3

*Equipment	*Tag No.	*Control Function
Pressurizer Heaters	RCS-EH-03	On/Off
Pressurizer Heaters	RCS-EH-04A	On/Off
Pressurizer Heaters	RCS-EH-04B	On/Off
Pressurizer Heaters	RCS-EH-04C	On/Off
Pressurizer Heaters	RCS-EH-04D	On/Off